

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,  
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**EXHIBITS IN SUPPORT OF PROPOSED DEFENDANT-INTERVENORS'  
MOTION TO INTERVENE**

Exhibit 1.1: **Declaration of M.B.**

Exhibit 1.2: **Declaration of K.C.**

Exhibit 1.3: **Declaration of Y.D.**

Exhibit 1.4: **Declaration of G.E.**

Exhibit 1.5: **Declaration of A.G.**

Exhibit 1.6: **Declaration of I.G.**

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Exhibit 1.8: **Declaration of J.L.**

Exhibit 1.9: **Declaration of R.S.**

Exhibit 1.10: **Declaration of Sarah Cole**

Exhibit 1.11: **Declaration of Fadhal Moore**

Exhibit 1.12: **Declaration of Arjini Kumari Nawal**

Exhibit 1.13: **Declaration of Itzel Libertad Vasquez-Rodriguez**

Exhibit 1.14: **Declaration of Keyanna Wigglesworth**

# **EXHIBIT 1.1**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

**STUDENTS FOR FAIR ADMISSIONS,  
INC,**

**Plaintiff,**

**v.**

**PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),**

**Defendants.**

**Civil Action No. 1:14-cv-14176-DJC**

**DECLARATION OF M.B.**

**M.B., pursuant to 28 U.S.C. Section 1746, declares the following:**

- 1. My name is M.B., I am under 18 years of age and I am fully competent to make this Declaration.**
- 2. I attend a private school, and am in the 11<sup>th</sup> grade.**
- 3. I am African American and Caucasian.**
- 4. My school coursework includes the follow Advance Placement Courses: World History, Biology, and Spanish Language. I will be taking Calculus BC, Physics I, and Spanish Literature.**

5. My extracurricular activities include Brain Talk/Quidsi and the Feminism Club, and my community service includes volunteering at a local “no kill” animal shelter.
6. I self-published a novel at the age of fifteen. I wrote it in a month for an annual writing contest, NaNoWriMo, in my freshman year. I later edited it and published it through CreateSpace the summer before my sophomore year.
7. In college, I think my racial identity will serve to show non-diverse kids the new normal. I think that being mixed-race is an important change for our society. Just being so can have a positive impact on a college or on my college experience because of the message it broadcasts, which is that diversity comes in many forms, and that it is important to understand what diversity means and what it can look like.
8. I hope that there is a relatively high percentage and representation of minority students on my college campus. I personally believe that white kids are not the only ones who should be able to receive higher education, and I would like to go to a college where other minority kids think that as well.
9. I think diversity is the pinnacle of the “American dream,” and college is a turning point in the lives of many young adults. So, I think it is important for them to be exposed to the world they are living in. Our modern world has so many different sides to it, many of which come from the different cultures, backgrounds, and identities of minority or diverse students.
10. When I apply to college, I intend to apply to Harvard University. I plan also to apply for financial aid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 27, 2015.

M.B.

M.B.

# **EXHIBIT 1.2**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendant,

and

[\_\_\_\_\_] ,

Proposed Defendant-  
Intervenors.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF K.C.**

K.C., pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is K.C. and I am fully competent to make this Declaration.
2. I attend a parochial high school, where I am in the 10<sup>th</sup> grade.
3. I am an enrolled member of the Coquille Indian Tribe.
4. My school is majority white, with an Indian population of 1%.
5. My school is a challenging college-prep school. I have been an Honor Roll student while at my school, and my G.P.A. is consistently above a 3.75. In addition to my core classes, I have taken Honors Math and Science courses during

9th and 10th grades. I am studying French as my foreign language.

6. My work and volunteer experience includes being a student intern for the Affiliated Tribes Energy Program (June- August, 2014 and again this summer, 2015), and a volunteer for the A. Susana Santos: Journeys In Creativity, Exploration in Native American Art community outreach workshops.
7. I have been active in the following school-sponsored clubs: the American Indian Science and Engineering Society, the Earth Club and the Food Club.
8. My community involvement includes being a member of the Grand Ronde and Coquille Tribal Canoe Families (both are community cultural groups). Every summer I participate with my Canoe Families in the Tribal Canoe Journey. I am also a student artist. My artwork is sold at the Coquille Indian Tribe's gift shop.
9. In addition to being an enrolled member of the Coquille Indian Tribe, I am also of Warm Springs, Wasco, Yakama, and Snoqualmie descent. I have spent a significant amount of time learning about my tribal heritage, and traveling to different tribal communities for cultural gatherings. I have spent a lot of time with my grandparents on both sides of my family, learning about my heritage from them. My Father is of Coquille, Coos, Filipino, and Caucasian heritage. My Mother is of Warm Springs, Wasco, Yakama, Snoqualmie, Filipino, Chinese, and Caucasian descent.
10. As a Native American student, I am an underrepresented minority at my school. I believe my Native American identity gives me a unique perspective among a student population that is predominately Caucasian and Christian. My worldview is shaped by my family, community, formal education, and my tribal cultural

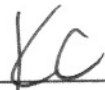


knowledge and experiences.

11. I know access to higher education in my Native American community is a privilege, and many deserving students do not get the opportunity to go to college. This is unfortunate as many Native American students can offer so much to the college learning environment. So, I know when I go to college I will actively seek opportunities to share with my peers my unique perspectives that have been shaped by my Native American heritage.
12. In college, I am hoping to find a racially diverse environment.
13. Racial diversity adds depth and richness to the learning experience and forces us as students to challenge our opinions and beliefs.
14. When I apply to college, I plan to apply to Harvard University and I will seek financial aid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 27, 2015.

  
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K.C.

# **EXHIBIT 1.3**

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendant,

and

[\_\_\_\_\_],

Proposed Defendant-  
Intervenors.

Civil Action No. 1:14-cv-14176-DJC

DECLARATION OF Y.D.

Y.D., pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Y.D. and I am fully competent to make this Declaration.
2. I attend a public high school, where I am in the 11<sup>th</sup> grade.
3. I am a member of the Oneida Tribe.
4. My school has an Indian population of 5-10%.
5. I have maintained being on honor roll all throughout high school. I have taken college credit level classes, and I am a member of the National Honor Society. I have received the award of Outstanding Student of the Year awarded by my state's Indian Education Association.

6. Throughout my high school career, I have participated in basketball and track & field. I was a member of my high school's winter musical theatre production. I participate in the Native Daughters after school group offered by the student enrichment services at my school. I took part in helping plant wild rice at the new lake in my community, and I also work at my local McDonald's.
7. I was asked to be a cultural ambassador and give a presentation to our local elementary school's first grade students. The presentation consisted of information regarding the Oneida language, culture, practices, and beliefs.
8. I am very proud that I am Native American, and I believe that being a young Native American high school student has lots of extra responsibilities. For me, it makes me want to do the absolute best I can in everything I do to show that being Native American is, and will, not be a barrier for me. I embrace all aspects of my ethnicity and use that as my motivation. I want to make a positive difference.
9. In college I hope to find other Native Americans, and I hope to connect with them for support and encouragement throughout our college years. Also, I hope to find some type of Native American club or group.
10. It is my intention to apply to Harvard University. I also will apply for financial aid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 28<sup>th</sup>, 2015.

  
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Y.D.

# EXHIBIT 1.4

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF G.E.**

G.E., pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is G.E., I am under 18 years of age and I am fully competent to make this Declaration.
2. I am in the 9<sup>th</sup> grade at a public charter high school.
3. I am Native American, with a tribal enrollment in the Gila River Indian Community.
4. There is a 1% Native American population in my school, and a white population of 68%.
5. I'm taking five honors classes per semester. My first/fall semester's honor classes were Honors Geometry, Honors Poetry, Honors Biology, Honors Humane Letters,

and Honors Spanish. This spring semester, I am taking Honors Biology, Honors Geometry, Honors Humane Letters, Honors Spanish, and Honors Fine Arts. (Humane Letters is a rigorous combination of an English and History class. It is worth two credits.)

6. I participate in sports (JV Volleyball, JV Basketball, Varsity Traveling Club Basketball); I tutor middle school students in math; I was in the school orchestra and choir; I coach middle school basketball; and, I am in the Upward Bound program at a well-known state university.
7. I dance competitively at powwows, which are Native American social events. Most recently, I won first place in the Teen Jingle Dress Dance at an Indian Fair in my state in March. I have danced since I could walk. Dancing is an important part of my identity. I have a large extended family, many of whom live on the reservation. They are my link to my culture and a major reason why I want to go to college.
8. Most of my school's staff members have no concept of extended Native family or community obligations or of dealing with tribal services. (There are some exceptions.) However, these examples are typical: when I took two days off to travel to my South Dakota reservation while my great-uncle (in Native terms, my Grandpa) was dying, I was disciplined for vacationing. When I get health care from my tribal clinic, which has limited hours, my teachers cannot understand why I cannot schedule appointments outside of school hours. My school coaches criticize choosing to attend an infrequent yet important tribal event over optional practices. I could go on.



9. My school does do lots of things well. It's academically very strong and offers a small campus and small classes. All my teachers know me. My college counselor is very supportive. The rigorous classes seem to cut down the number of students who just goof off. However, understanding Native life just is not a strength of the school.
10. I'm more likely to select a college that has an Indian community. I'm more likely to select a college that offers Native American studies. In college, I hope to find more racial diversity in the students and more open-minded teachers. I also hope to find people who are similar to me.
11. I would like to be a surgeon someday and know college is an important step. I chose to attend my high school, knowing its lack of diversity, because of the number of honors courses it offers. It was a difficult decision – choosing between a diverse high school and an academically rigorous one. I chose the school that I thought would best prepare me for college. Not every Native student has this choice. Schools in Indian communities are notoriously bad. I feel very fortunate.
12. Even though I have significantly more resources and opportunities than my on-reservation family members and peers, I cannot afford to enroll in the costly SAT test prep courses that most of my schoolmates attend.
13. When I apply to college three years from now, I plan to apply to Harvard University. I will also apply for financial aid.



I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 28, 2015.



G.E.

# **EXHIBIT 1.5**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF A.G.**

A.G., pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is A.G., I am under 18 years of age and I am fully competent to make this Declaration.
2. I am in the 11<sup>th</sup> grade at a private high school.
3. I am of Hispanic heritage.
4. Hispanic students are in the minority in my school.
5. I have a very high GPA, and have taken the following advanced courses: AP Chemistry; AP Computer Science (Java); AP Calculus; AP Statistics; College Trig-Based Physics; Molecular Biology; and AP Spanish Language.

6. My extracurricular and volunteer experiences include: The Hispanic Student Association (2013- present), Club Soccer Team Captain (State Championship finalists, 2013); High School Soccer, Varsity starter 2012 to present (State Champions, 2012; semi-finalists, 2013; finalists, 2014); High School Soccer – Varsity Soccer Player of the Year 2014; Track and Field participant; Youth soccer coach and referee; Summer High School Pre-Medical Institute, Washington University in St. Louis (July 2014); North Science Center volunteer; Project Share volunteer; Roadrunner Food Bank volunteer; and, Read to Excel volunteer.
7. I am also of Filipino descent. My race and ethnicity are at the core of who I am, how I view the world, and in many ways, how others view me. Culturally, my beliefs and principles are grounded in my family and our history. In turn, this has provided me a richer understanding and appreciation for my friends and colleagues at school (both regardless of and in regard for their race, gender and culture), a greater value in our differences and a deeper desire to encourage participation by what each of us brings to the conversation.
8. I believe that because of my family, our history, our experiences and our beliefs, I can contribute in much more meaningful, broader and important ways to not only my education, but to the education and understanding of others around me.
9. In college I hope to be part of a highly diverse environment, including race, ethnicity, gender, points of view, and other elements that create opportunities for learning, growing and appreciating variety and understanding.

10. My plans include applying to Harvard University. I plan to apply for scholarships and any other form of financial aid that may be available to me.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 28, 2015.

A handwritten signature in cursive script, appearing to be 'A.G.', is written above a horizontal line.

A.G.

# **EXHIBIT 1.6**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

DECLARATION OF I.G.

I.G., pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is I.G., I am under 18 years of age and I am fully competent to make this Declaration.
2. I am in the 9<sup>th</sup> grade at an independent high school.
3. I am Hispanic.
4. My school is approximately 50% white and 50% minority.
5. My relevant coursework includes Math: Algebra I and II, Geometry, Trigonometry, Pre-calculus; Science: Earth Science, Physics I, Chemistry I; and, Spanish (IA, IIA), English, and History.
6. Award and Honors I've received:

- a. The Follansbee Award (awarded for unusually distinguished academic and athletic records at my school) – May 2012
  - b. The Robert Schroeder Memorial Award (awarded for best exemplifying the ideals of my school through spirit, citizenship, and contribution to the welfare of the school) – May 2014
  - c. My artwork was selected for a juried exhibition at an art gallery in a well-known center for art, and I received the Alumni Award for unique vision and creativity – April 2015
7. My relevant extracurricular activities are: USATF Cross Country Junior Olympics National Championships 2012; Varsity Track and Field (State Championship medalist, 2014); Competitive Soccer (2008-2015); Varsity High School Soccer (2014), and Basketball.
8. My volunteer activities include cooking meals for families staying at the local Ronald McDonald House, preparing and serving meals to low-income and homeless people of my community through a local agency, and sorting produce at a local food bank.
9. I'm proud of my heritage, being Hispanic and Filipino. Through my interactions with my cousins, friends, and volunteer activities, I've come to appreciate differences based on family, socio-economic status and alternative experiences. I think that my own experiences and heritage give me a unique perspective that is important to share with others.
10. The campus environment I would prefer is one that brings together people of different races, ethnicities and perspectives. I believe that a variety of perspectives ultimately results in better solutions.
11. Although my college applications are several years away, I want to apply to Harvard University. I will also apply for financial aid.



I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 28, 2015.

IG

I.G.

# **EXHIBIT 1.7**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,  
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF R.H.**

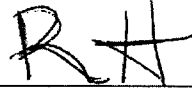
R.H., pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is R.H., I am under 18 years of age and I am fully competent to make this Declaration.
2. I attend an independent high school, where I am in the 11<sup>th</sup> grade.
3. I am African American.
4. My school has only a very small percentage of African-American students.
5. Whenever there's a character in a book the class is reading who has the same ethnicity as me, I am called upon to comment on that character and motivations, as though just being black makes me understand.
6. In college I hope to find a more racially diverse environment, where I can find my place in the community.

7. By the time I graduate, I will have taken 5 A.P. courses.
8. I am a participant with Science Olympiad, and I will be representing my school at nationals next month.
9. I run track and field, I work as a lifeguard year round, and I have done community service at Wanagi Wolf Fund and Rescue.
10. Next year I plan to apply to Harvard University and I also will apply for financial aid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 27, 2015.

A handwritten signature in black ink, consisting of a stylized 'R' followed by a horizontal line and a vertical stroke, resembling 'RH'.

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R.H.

# **EXHIBIT 1.8**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF J.L.**

J.L., pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is J.L., I am under 18 years of age and I am fully competent to make this Declaration.
2. I attend a private school, and am in the 10<sup>th</sup> grade.
3. My tribal affiliation is Jemez Pueblo and Zuni Tribe.
4. My school is approximately 50% students of color, but there are few Native American students.
5. I have taken advanced courses in math, science, language and other core courses.
6. I have participated in three years of varsity cross-country and track, and two years of basketball. I have been playing classical guitar for five years at my school.

Also, I was selected to run on the Wings of America team, a qualifying team of the top 7 Native American runners in the country, to represent Native communities across the US at the USA Cross Country National Meet (2014 & 2015).

7. I participate in traditional Pueblo Indian dances and cultural events throughout the year in Jemez Pueblo and Zuni Tribe. Being a Native American makes me unique to my classmates, who seem to have little knowledge of Native American life. It allows me to bring my experiences and ideas to another community away from home.
8. In college I hope to provide a good influence on my peers by being an ambassador of the Native American world. I believe the majority of the U.S. population does not have much knowledge about Native Americans. They only know the stereotypes of substance abuse and Indian casinos. I want to attend a highly regarded college to obtain the best education, so that I may come back home and improve the lives of people of my community in Jemez, Zuni, and my state.
9. Being around a diverse community enables me to interact with different people who have their own personal backgrounds, which have formed their outlook on life. When I meet Native Americans of other tribes, I am able to connect with them easily because we share the same challenges and interests.
10. Receiving a good education has been the hope of my parents for my brothers and me, so that we can go back to our communities in Jemez and Zuni Pueblos to improve the current living situation on the reservation. My people suffer from

alcoholism, obesity, and poverty, which is my inspiration to earn good grades and to strive for excellence. I want to practice medicine, so I can take my skills to the communities that are in dire need of quality medical education and services.

11. I have also used my success in running to reach other Native American youth in New Mexico and across the country. Running has allowed me to connect to more Native Americans from other tribes and given me an opportunity to inspire them to strive for the best of their ability. I try to show them that another Native American can excel in education and athletics to be competitive with the outside world. The Native American communities are in need of good, positive influences that show what Native Americans are capable of, and show that it is possible to be successful.

12. I plan to apply to Harvard University. I will also apply for financial aid because it is very expensive to attend prestigious colleges and universities like Harvard.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 28, 2015.

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J.L.



# **EXHIBIT 1.9**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF R.S.**

R.S., pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is R.S., I am under 18 years of age and I am fully competent to make this Declaration.
2. I am a 9<sup>th</sup> grader in a public high school.
3. I am Native American, of the Confederated Tribes of the Umatilla Indian Reservation.
4. My school is majority white.
5. I am currently in 2 AP honors classes.

6. My extracurricular activities include being a youth employee, a babysitter, a fisherman and a basketball player. I am also active in my Tribal culture.
7. I am the only enrolled Tribal member from a Tribe in my state in a high school of 2,068 students. There is little knowledge of tribal culture at my school. I stand out as a Native student.
8. If I will be one of few Native Americans in my college, it may make it harder to relate to other students, and they may lack authentic knowledge of my background. Hopefully I will have a more diverse college experience, one where I don't stand out as the only Native American Tribal member.
9. Harvard University is in my application plans for college. I am interested in receiving financial aid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 28, 2015.

R. S.

R.S.

# **EXHIBIT 1.10**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,  
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF SARAH COLE**

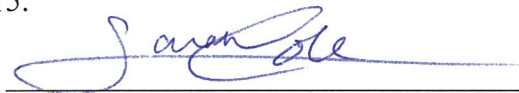
Sarah Cole, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Sarah Cole, and I am at least 18 years of age and fully competent to make this Declaration.
2. I am a full-time undergraduate student at Harvard College. I am in my junior year and am pursuing a Special Concentration in Education and American Society.
3. I describe my race and/or ethnicity as Black or African American.
4. I currently experience academic and/or personal benefits from attending Harvard as part of a racially diverse student body, and I desire to learn alongside students who are each a part of a critical mass of their race/ethnicity.
5. I believe my background enables me to offer unique perspectives and cultural experiences in my academic and campus activities.

6. I believe my education would be harmed if Harvard stopped considering race in its admissions policy. The current policy facilitates the admission of strong African-American students, which improves my educational experience by allowing me to learn alongside a greater number of African American students so that I do not feel singled out as a spokesperson for my ethnicity. The policy likewise facilitates the admission of strong underrepresented minority students with racial or ethnic backgrounds different from my own and from whom I feel I learn both inside and outside the classroom.
7. I believe the benefits of racial or ethnic diversity play an important role in a number of academic and campus activities that affect my undergraduate experience, including lectures, sections, house life, student government, communities of faith, extracurricular activities such as the debate team, mock trial, and Model UN, and community service programs through the Phillips Brooks House Association.
8. I would like to see an increase in the number and diversity of underrepresented racial groups admitted to Harvard.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 28, 2015.



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Sarah Cole

# **EXHIBIT 1.11**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,  
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF FADHAL MOORE**

Fadhal Moore, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Fadhal Moore, and I am at least 18 years of age and fully competent to make this Declaration.
2. I am a full-time undergraduate student at Harvard College. I am in my senior year and am majoring in government.
3. I describe my race and/or ethnicity as African American.
4. I currently experience academic and/or personal benefits from attending Harvard as part of a racially diverse student body, and I desire to learn alongside students who are each a part of a critical mass of their race/ethnicity.
5. I believe my background enables me to offer unique perspectives and cultural experiences in my academic and campus activities.



6. I believe my education would be harmed if Harvard stopped considering race in its admissions policy. The current policy facilitates the admission of strong African-American students, which improves my educational experience by allowing me to learn alongside a greater number of African-American students so that I do not feel singled out as a spokesperson for my ethnicity. The policy likewise facilitates the admission of strong underrepresented minority students with racial or ethnic backgrounds different from my own and from whom I feel I learn both inside and outside the classroom.
7. I believe the benefits of racial or ethnic diversity play an important role in a number of academic and campus activities that affect my undergraduate experience, including lectures, sections, and community service. Similarly, the presence of cultural affinity groups helps students from underrepresented racial minority groups, including myself, to understand the cultural cues of the “culture of power” and ease their and my transition to the campus.
8. I would like to see an increase in the number and diversity of underrepresented racial groups admitted to Harvard.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 28, 2015.

  
Fadhal Moore

# **EXHIBIT 1.12**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,  
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF ARJINI KUMARI NAWAL**

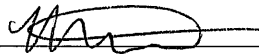
Arjini Kumari Nawal, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Arjini Kumari Nawal, and I am at least 18 years of age and fully competent to make this Declaration.
2. I am a full-time undergraduate student at Harvard College. I am in my freshman year and am planning on majoring in History and Literature.
3. I describe my race and/or ethnicity as Asian American of Sri Lankan Descent.
4. I currently experience academic and/or personal benefits from attending Harvard as part of a racially diverse student body, and I desire to learn alongside students who are each a part of a critical mass of their race/ethnicity.
5. I believe my background enables me to offer unique perspectives and cultural experiences in my academic and campus activities.

6. I believe my education would be harmed if Harvard stopped considering race in its admissions policy.
7. I believe the benefits of racial or ethnic diversity play an important role in a number of academic and campus activities. I am involved in Harvard Model Congress and the radio station, both of which benefit enormously from racial diversity and in the membership of people with different backgrounds.
8. I would like to see an increase in the number and diversity of underrepresented racial groups admitted to Harvard. In addition, I serve on the Student Advisory Board to the Dean of Humanities, where, as the only member of color, I have brought up the lack of diversity in the humanities program at Harvard.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 27, 2015.



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Arjini Kumari Nawal

# **EXHIBIT 1.13**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,  
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF ITZEL LIBERTAD VASQUEZ-RODRIGUEZ**


Itzel Libertad Vasquez-Rodriguez, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Itzel Libertad Vasquez-Rodriguez, and I am at least 18 years of age and fully competent to make this Declaration.
2. I am a full-time undergraduate student at Harvard College. I am in my sophomore year and am majoring in Sociology.
3. I describe my race and/or ethnicity as Native American and Latina of Mexican Ancestry.
4. I currently experience academic and/or personal benefits from attending Harvard as part of a racially diverse student body, and I desire to learn alongside students who are each a part of a critical mass of their race/ethnicity.
5. I believe my background enables me to offer unique perspectives and cultural experiences in my academic and campus activities.

6. I believe my education would be harmed if Harvard stopped considering race in its admissions policy. The current policy facilitates the admission of strong Native American and Latino students, which improves my educational experience by allowing me to learn alongside a greater number of both Native American and Latino students so that I do not feel singled out as a spokesperson for my ethnicity. The policy likewise facilitates the admission of strong underrepresented minority students with racial or ethnic backgrounds different from my own and from whom I feel I learn both inside and outside the classroom.
7. I believe the benefits of racial or ethnic diversity play an important role in a number of academic and campus activities that affect my undergraduate experience, including varsity sports teams, class lecture, class section, Phillips Brooks House Association (PBHA) programs, Undergraduate Council, pre-professional programs, Finals Clubs, sororities, fraternities, The Crimson, and most student organizations.
8. An increased presence of underrepresented racial minority groups would allow, for example, students involved in public service programs with PBHA to more deeply understand and be able to help the communities they serve. Increased racial and ethnic diversity would improve class lectures and sections by bringing nuances to class discussions and offering unique perspectives in class conversations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 28, 2015.

  
\_\_\_\_\_  
Itzel Libertad Vasquez-Rodriguez

# **EXHIBIT 1.14**



**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,  
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF KEYANNA WIGGLESWORTH**

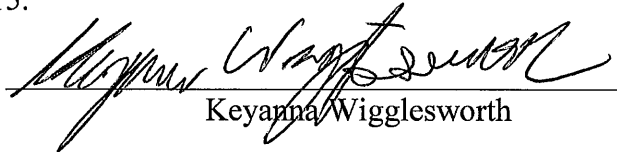
Keyanna Wigglesworth, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Keyanna Wigglesworth, and I am at least 18 years of age and fully competent to make this Declaration.
2. I am a full-time undergraduate student at Harvard College. I am in my junior year and am majoring in Latin American Studies and Romance Languages and Literature.
3. I describe my race and/or ethnicity as Black American.
4. I currently experience academic and/or personal benefits from attending Harvard as part of a racially diverse student body, and I desire to learn alongside students who are each a part of a critical mass of their race/ethnicity.
5. I believe my background enables me to offer unique perspectives and cultural experiences in my academic and campus activities.

6. I believe my education would be harmed if Harvard stopped considering race in its admissions policy.
7. I believe the benefits of racial or ethnic diversity play an important role in a number of academic and campus activities, including all student organizations, Undergraduate Council, College Events Board, Harvard College Women's Center, and the Institute of Politics.
8. I would like to see an increase in the number and diversity of underrepresented racial groups admitted to Harvard.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 27, 2015.

  
Keyanna Wigglesworth

**CERTIFICATE OF SERVICE**

In accordance with Local Rule 5.2(b), I hereby certify that this document filed through the ECF system on April 29, 2015 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Rahsaan D. Hall

Rahsaan D. Hall, BBO # 645369

LAWYERS' COMMITTEE FOR CIVIL RIGHTS

AND ECONOMIC JUSTICE

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ATTORNEY FOR PROPOSED DEFENDANT-  
INTERVENORS